

DOCKET FILE COPY ORIGINAL

Commission's Secretary: Ms. Magalis Salas
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

9F2K1



Re: In the Matter of Reallocation of the 216-217 Mhz.

ET Docket NO. 00-221

One in ten Americans have a hearing problem whether they know it or not. This could be you and probably is someone you know. Denial is legion.

For another indication of widespread Hard of Hearing issues, notice that the Telephone/TTY Relay Service was forced to expand several times and will have its own three digit access number "711", something you yourself, the FCC, the Federal Government, has mandated that all states have online by one October.

F.M. is widely used for hearing access; public address systems can have F.M. options and lapel microphones with belt worn transmitters are used in auditoriums, classrooms, and tours, etc. as well as for personal use.

There are pros and cons for each of our available options of audio, infrared, F.M. and magnetic coil. However, F.M. is the ONLY feasible option in many situations and for the F.C.C. to remove this unique access is a VIOLATION OF FEDERAL LAW specifically the American's with Disabilities Act.

Enclosed is a draft of an information paper for emergency service people that some of us are working on. I hope you find it enlightening.

Would broadcasters be willing to lose one out of ten customers right off the bat? That would be akin to your legacy.

If not now, "soon", you or someone you know will probably need an F.M. device to try to hear. DO NOT DO THIS to huge numbers of Americans or to yourself: OBEY THE LAW!!

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HAPPY HUMUS

DAVID GLENN HOFFMAN

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To: Whom it may concern
From: David Glenn Hoffman
Re: Enclosed: Some Hard of Hearing Issues for Emergency People

Emergency personnel and operations are affected by huge numbers of Hard Of Hearing people, misconceptions, and lack of information.

The enclosed is a draft of basic information.

It is not intended to be the final version. It is intended to inform trainers so they can word and present this information in the manner they feel is best.

It is hoped that members of Self Help for Hard of Hearing People of Lane County, Inc. and other knowledgeable and experienced people can assist trainers to produce a useful training aid with the goal that we can all communicate and understand better.

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Some Hard of Hearing Issues for Emergency People
(and most other people too).



Have you ever heard of "911"? Very good! How many of you have heard of "711"? More on this later.

One in ten Americans have a hearing problem whether they know it or not. This could be you and probably is someone you know. Of those who know it a large portion will ignore or hide the condition because of the stigma of being viewed as stupid or deranged. It will be a significant number of your contacts and much more than wheelchairs and white canes which are highly visual and to which people can relate to quickly.

A few terms will cover most issues: HOH (hard of hearing) vs. profound/"stone" deaf; early vs. late deafened; noise; behind-the-ear, in-the-ear, or in-the-canal H.A.'s (hearing aids); cochlear implant; and a few more.

Very few people are "profound" or "stone" deaf, most are HOH (hard of hearing) and are in the levels "mild, moderate, severe." "Deaf" is pretty much a distinct and separate culture.

Few are "early deafened", most are "late deafened". The differences are many and critical: the public stereotype is of a person who can read lips and use sign language. Usually only the early deafened will be functional having grown up with it. Yet even in the best of circumstances lip reading gives only 75% comprehension and no one can read lips on the phone. Most of your contacts will be with the HOH who cannot read lips to a significant degree and cannot use sign language and who just fifty years ago, before small electronics, would be considered the village idiot.

H.A.'s (hearing aids) are not a cure: like a crutch they can get a person off the sofa but running is out. Even with the latest technology H.A.'s are still basically a microphone, amplifier, and speaker. Some people you encounter with a direct-to-nerve connection called a "cochlear implant" or with a high tech, multi-channel, digital H.A. will have a handheld remote programmer device.

Noise is one of the major limiting factors. Think of your experiences: how well do you communicate on a radio or cell phone when the other person is in noise? The microphone picks up everything and for the HOH "Life is like a movie with a bad soundtrack." HOH people have been shot because they did not hear the word "stop".

Technology beyond H.A.'s uses the choice of a coil instead of a microphone; the original use and why it is named the "T" or "telephone" "coil" or "switch" is to hear "better" on the phone. Some phones leak magnetic energy which like a power transformer induces the incoming phone signal into the H.A.'s coil. To exclude ambient noise the H.A. microphone is turned off and input is only through the magnetic coil. Not all phones are "H.A. compatible": some of the newer phones use technology that does not leak magnetism and a so-called "amplified phone" without magnetic output is not a "H.A. compatible" phone. Federal law requires public phone access; pay phones have a blue grommet where the cord goes into the handset. There is a glitch: with all the electric noise out there some of it will induce into the H.A. coil as noise. This means that the phone the HOH person is using or your phone that is available for public access may be non-functional if it is near a fluorescent light or computer. Public phones may soon have to be infra-red coupled. 911 operators giving instructions may need to emergency boost volume to be heard on a regular phone.

In some public facilities part of the p.a. system is routed to a coil "looped" around the room; a H.A. set for "T-switch" will pick up directly.

Beyond phone use the coil can pick up from A.L.D.'s (Assistance Listening Device, not to be confused with A.D.L., Aids for Daily Living).

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These are coil output amplifiers with different inputs, and come in public and personal models.

If a HOH person goes to a theater or public hall, they turn in their driver's license and get either a loop that fits around their neck or a set of headphones with coils and some audio for the mild to moderate deafened. Near the sound speakers are I.R. (infra-red) emitters which radiate to the I.R. receivers on the neck loop or headphones. With the H.A. microphone off there is full sound track and no sound of chewing popcorn! Similar units are used with home T.V.'s.

The other general type is a shirt pocket size amplifier with various inputs and a jack for either an earpiece or usually a coil output. The coil can be a loop around the neck or a flat behind-the-ear shaped coil placed next to the H.A. Wired inputs can be audio, I.R., F.M., coil, and vibration sensor. So far, none put it all together and frequenciless and modulation vary. Microphone inputs can be generic wide angle; highly directional, similar in appearance and size to a double-A flashlight; lapel mic; or a flat square which uses a conference table, stage, or other large surface as a sound board.

F.M. transmitters are either built-in to a p.a. system, or a lapel mic wired to a belt-worn transmitter; the pocket amp has a built-in receiver.

For those who can not hear on the phone there is a free relay service using TTY's (telephone typewriters) and a phone operator. It has 800 numbers for TTY-to-voice and voice-to-TTY. To try to impress upon you the wide range of the HOH problem and to answer the first question you should know that the response to the relay system has forced several expansions and the phasing in of the quick-access universal-code phone number known as "711". The FCC has mandated that all states must have 711 online by one October.

Emergency people more than most know the skill and energy good listening requires. You can hear the words and assess. If HOH people cannot hear the words, they cannot assess and make reasonable decisions and the drain of emotional and physical energy complicates and aggravates everything.

A HOH person will understand better if you face them. This lets them know that you are talking to THEM so they can exert the extra energy to try to hear and wittingly or unwittingly can get some, even if minor, part of their total hearing from lip reading. Enunciate (speak distinctly) to be better understood. Most people hear better with flat midwest English known as "International Airplane Pilot English". Any accent, high speed, or "way" of talking usually will be as little understood as a foreign language.

"Real time captioning" is increasingly being provided in various situations by court reporters with special skills, software, and tools.

Service animals, "Hearing-Ear Dogs", have the same access rights as their owners including restaurants and public transportation. It is up to the owner to decide how the animal will aide them and the ADA (Americans with Disabilities Act) forbids local jurisdictions from setting standards. Messing with a service animal is a crime; details are being worked on.

The international symbol for the HOH and deaf is the ear with slash. You may see HOH symbols on homes, work places, vehicles, accessible facilities, lapels, jewelry, A.L.D.'s, radio mics, and hardhats; postage stamp size stick-ons appear on I.D. cards, medical files, and whatever.

31JA2K1 David Glenn Hoffman 484-9204

cc: City of Eugene Trainers: Karen Anderson, EMS; Bruce Perkins, Police
SHHH: (V/TTY) Bonne Bandolas 689-3701, Andrea Cabral 345-1332, **RECEIVED**
Karin Smith (TTY) 726-1323, Karen Swezey 689-7242

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